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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Marvin Dewey Morris and Meihua Zhang,

Plaintiffs,

v.

Merrick Garland, Attorney General of the  
United States of America; Alejandro  
Mayorkas, Secretary of the Department of  
Homeland Security; Ur M. Jaddou, Director,  
U.S. Citizenship and Immigration Services;  
Clyde Moore, Field Office Director, Las  
Vegas Field Office U.S. Citizenship and  
Immigration Services,

Defendants.

Case No. 2:22-cv-00426-DJA

**Stipulation to Extend the United States'  
Deadline to Answer**

**(Fourth Request)**

Plaintiffs Marvin Dewey Morris and Meihua Zhang and the United States of  
America, on behalf of Federal Defendants Merrick Garland, Alejandro Mayorkas, Ur M.  
Jaddou, and Clyde Moore, through counsel, hereby stipulate and agree as follows:

1. Plaintiffs filed their Complaint on March 8, 2022.

2. Plaintiffs served the United States with a copy of the Summons and  
Complaint on June 9, 2022.

3. The deadline for Federal Defendants to answer or otherwise respond was  
extended to October 7, 2022. *See* ECF Nos. 8–9.

1           4.       The parties again stipulated to extend the deadline for Federal Defendants to  
2 answer or otherwise plead by another 30 days (ECF No. 10). The Court granted the  
3 extension (ECF No. 11).

4           5.       Thereafter, the parties again stipulated to extend the deadline for Federal  
5 Defendants to answer or otherwise plead by another 30 days, until December 7, 2022 (ECF  
6 No. 11). The Court, again, granted the extension (ECF No. 12).

7           6.       Since the granting of the previous extensions, the parties have agreed that the  
8 United States shall have 30 additional days to file an answer or other responsive pleading  
9 on behalf of Federal Defendants. Since the time the Court granted the last extension, the  
10 parties have continued to work at the administrative level to attempt to resolve some or all  
11 the issues involved in this litigation and/or alleviate the need for court intervention,  
12 including the request for and submission of additional documents. However, the agency  
13 has experienced some delay due to the prescheduled time off of the officer working on this  
14 case. Accordingly, the parties request that Federal Defendants' deadline to file a responsive  
15 pleading be extended an additional 30 days to allow the parties to continue to work  
16 towards resolution.

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Therefore, the parties request that the Court extend the deadline for the United States  
 to answer or otherwise respond to January 6, 2023.

JASON M. FRIERSON  
United States Attorney

/s/ Skyler H. Pearson  
 SKYLER H. PEARSON  
 Assistant United States Attorney

*Attorney for Plaintiffs*

*[Handwritten signature]*

**DATED:** December 8, 2022